

Message

From: Parsons, Doug [Parsons.Douglas@epa.gov]
Sent: 10/28/2020 12:57:27 PM
To: sbennett@thehcpa.org; Douglas Troutman [DTroutman@CleaningInstitute.org]; Wheeler, Cindy [Wheeler.Cindy@epa.gov]
CC: Kathleen Stanton [KStanton@CleaningInstitute.org]; Nathan E. Sell [NSell@CleaningInstitute.org]; Wolf, Joel [Wolf.Joel@epa.gov]; Kramek, Niva [kramek.niva@epa.gov]
Subject: RE: Exposure Data for Consumer Uses of 1,4-dioxane

Good morning Steve

Thanks again for all your work on 1,4-dioxane. Can you provide an update on the possibility of submitting additional data on levels of 1,4-dioxane in ingredients and finished products. Any sense of timing for this additional data would be useful.

doug

From: Parsons, Doug
Sent: Friday, October 23, 2020 1:29 PM
To: Steven D. Bennett <sbennett@thehcpa.org>; Douglas Troutman <DTroutman@CleaningInstitute.org>; Wheeler, Cindy <Wheeler.Cindy@epa.gov>
Cc: Kathleen Stanton <KStanton@CleaningInstitute.org>; Nathan E. Sell <NSell@CleaningInstitute.org>
Subject: RE: Exposure Data for Consumer Uses of 1,4-dioxane

Steve

As discussed yesterday, if manufacturers or processors have data on the levels of 1,4-dioxane in either raw ingredients or finished products, the agency would be interested in receiving that data. If HCPA would like to submit it without reference to a specific company, e.g. Company A, Company B, we would be acceptable.

Please let us know if there are further questions. And thanks again for all the work on this.

doug

From: Steven D. Bennett <sbennett@thehcpa.org>
Sent: Thursday, October 22, 2020 10:55 AM
To: Parsons, Doug <Parsons.Douglas@epa.gov>; Douglas Troutman <DTroutman@CleaningInstitute.org>; Wheeler, Cindy <Wheeler.Cindy@epa.gov>
Cc: Kathleen Stanton <KStanton@CleaningInstitute.org>; Nathan E. Sell <NSell@CleaningInstitute.org>
Subject: RE: Exposure Data for Consumer Uses of 1,4-dioxane

Doug,

Still awaiting additional feedback on several of the questions but I wanted to provide some input to possibly assist.

One suggestion for handwashing is some recent and authoritative data were developed to support the RIFM is the Crème aggregate exposure model (see Comiskey et al., 2017) (attached)

There was also a suggestion to refer to the EPA Exposure Factors Handbook (Tables 16-37, 16-38, 17-12, 17-37) and associated references that are relevant (I expect these to already be incorporated in risk evaluation but were not explicitly noted in DRE)

Handwashing:

- European Commission SCCS Notes of Guidance (see Tables 3 and 4)
https://ec.europa.eu/health/sites/health/files/scientific_committees/consumer_safety/docs/sccs_o_24.pdf

Manual Dishwashing

- European Union AISE (2015) Table of Habits and Practices for Consumer Products in Western Europe, https://www.aise.eu/documents/document/20150602150650-aise_sceds_supportingexplanation_document_may2015_v1.pdf
- WHO EHC 242 on Dermal Exposure, https://www.who.int/ipcs/publications/ehc/ehc_242.pdf
- Weegels ME & van Veen MP (2001) Variation of consumer contact with household products: a preliminary investigation. Risk Anal **21**(3):499–511.

Steven Bennett, Ph.D.

Senior Vice President, Scientific & Regulatory Affairs

Floor Care Division Staff Executive

Pest Management Products Division Staff Executive

HCPA Consumer Product Ingredients Dictionary

[Watch HCPA's new membership marketing video](#)

[HCPA is Here to Protect Your Business and Promote Your Story](#)



1667 K Street NW, Suite 300 | Washington, DC 20006

Direct: 202-833-7330 - Office: 202-872-8110



CONFIDENTIALITY NOTICE: This e-mail message (including any attachments) contains information from the Household & Commercial Products Association (HCPA) and is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-21, and is intended only for the named recipient (or recipients) and HCPA member companies. This e-mail, including any attachments or hyperlinks within it, may contain information that is confidential or otherwise protected from disclosure. If you are not the intended recipient of this email, you are not entitled to use, disclose, distribute, copy, print, disseminate or rely on this email in any way. Even if you are the intended recipient or a HCPA member company, you may not distribute, disclose or otherwise disseminate this email or its attachments outside the membership of HCPA, without HCPA's prior written consent.

From: Parsons, Doug <Parsons.Douglas@epa.gov>

Sent: Tuesday, October 20, 2020 10:28 AM

To: Douglas Troutman <DTTroutman@CleaningInstitute.org>; Steven D. Bennett <sbennett@thehcpa.org>; Wheeler, Cindy <Wheeler.Cindy@epa.gov>

Cc: Kathleen Stanton <KStanton@CleaningInstitute.org>; Nathan E. Sell <NSell@CleaningInstitute.org>

Subject: Exposure Data for Consumer Uses of 1,4-dioxane

Hello Kathleen, Steve, Doug, and Nathan

Thanks again for all the information to date. We are continuing to deliberate on 1,4-dioxane as part of the final risk evaluation under TSCA.

We have a few questions that are pasted below regarding consumer exposure scenarios for surface cleaners, dish soap, dishwashing detergent and laundry detergent.

Can you please take a look and let us know if you have answers to these questions, and if so, we would be very interested in obtaining the information as soon as possible. We are also glad to organize a call if that would be useful. Please let us know.

Thanks, doug

++++

1. Do you have any existing measured concentration levels or known concentration ranges of 1,4-dioxane in finished consumer products, specifically dishwasher detergent, dish soap, laundry detergent, and surface cleaners?
2. Do you have any existing survey or other data on specific product types (e.g., detergents, cleaners, dish soap) that can be used to inform duration or frequency of cleaning or washing activities?
3. Do you have any existing survey or other data on specific product types (e.g., detergents, cleaners, dish soap) that can be used to inform the amount of product used per day or per activity and/or the level of dilution typical for products used in hand washing activities?

Douglas W. Parsons
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Ave NW
Washington, D.C. 20460
Phone: (202)564-0341
Email: parsons.douglas@epa.gov